

**IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

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	:	Chapter 9
In re	:	
	:	Case No. 13-53846
CITY OF DETROIT, MICHIGAN,	:	
	:	Hon. Thomas J. Tucker
Debtor	:	
-----	X	

**STIPULATION FOR WITHDRAWAL OF CLAIM NUMBERS  
3726, 3748, 3749, AND 3756 FILED BY THE STATE OF MICHIGAN**

The State of Michigan (the “State”) and the City of Detroit, Michigan (the “City”), by and through their undersigned counsel, stipulate as follows in support of the entry of the *Order Withdrawing Claim Numbers 3726, 3748, 3749, and 3756* attached hereto as **Exhibit 1**.

1. On June 2, 2014, the State filed proofs of claim 3726, 3748, 3749, and 3756 (the “Claims”).
2. The Claims were filed as administrative claims in the Bankruptcy.
3. Upon discussion, the parties determined that the Claims are not entitled to administrative priority.
4. There are no pre-petition amounts owed on the Claims.
5. Any post-petition amounts associated with the Claims will be handled in the City’s ordinary course of business.
6. Therefore, the State hereby withdraws the Claims in their entirety.
7. Nothing in this stipulation shall be construed as an admission by the City that any post-petition amounts are due and owing to the State with regard to the Claims. Both parties

fully reserve all of their respective rights with respect to any post-petition or post-confirmation claims.

**WHEREFORE** the parties respectfully request that the Court enter an order in the form attached hereto as **Exhibit 1** approving the parties' stipulation.

Respectfully submitted by:

<b>LAMBERT LESER</b>	<b>FOLEY &amp; LARDNER, LLP</b>
By: <u>/s/ Rozanne M. Giunta (w/ consent)</u> Rozanne M. Giunta 309 Davidson Bldg. Bay City, MI 49707 Phone: (989) 893-3517 rgiunta@lambertleser.com  <i>Counsel to the State of Michigan</i>	By: <u>/s/ Tamar N. Dolcourt</u> John A. Simon (P61866) Tamar N. Dolcourt (P73425) Leah R. Imbrogno (P79384) 500 Woodward Ave., Ste. 2700 Detroit, MI 48226 Phone: (313) 234-7100 jsimon@foley.com tdolcourt@foley.com limbrogno@foley.com  <i>Counsel to the City of Detroit, Michigan</i>

Dated: July 23, 2015

**EXHIBIT 1: PROPOSED ORDER**

4831-4201-0150.1

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**ORDER WITHDRAWING CLAIM NUMBERS 3726, 3748, 3749, AND 3756**

This matter having come before the Court on the *Stipulation For Withdrawal of Claim Numbers 3726, 3748, 3749, and 3756 Filed by the State of Michigan* (the “Stipulation”); the State<sup>1</sup> having filed Claim Numbers 3726, 3748, 3749, and 3756 (the “Claims”) in the above-captioned bankruptcy case; the parties having agreed that the Claims should be withdrawn; and the Court being otherwise fully informed:

**IT IS HEREBY ORDERED THAT:**

1. The Stipulation is approved.
2. The Claims are withdrawn.
3. Any post-petition amounts associated with the Claims will be handled in the City’s ordinary course of business.
4. The City’s claims agent is permitted to take all actions necessary to effectuate this Order.

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<sup>1</sup> Capitalized terms not otherwise defined herein shall have the meaning given to them in the Stipulation.